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Attorneys for Plaintiffs
 Chanel, Inc. and Louis Vuitton Malletier, S.A.

THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHANEL, INC., a New York corporation
 and LOUIS VUITTON MALLETIER,
 S.A., a foreign business entity,

Plaintiffs,

v.

TONY BOSINI and DOES 1-10,
 individually and jointly, d/b/a
 REPLICAMASTER.COM,
 SHOPREPLICA.COM,
 BUYHIGHREPLICA.COM,
 EREPLICABAGS.COM,
 EXACTWATCHES.NET,
 REPLICAHOURS.COM,
 SWISSREPLICA.US,
 THEWATCHESPRICEINDEX.INFO,
 YOURREPLICAWATCH.COM, and
 REPLICAHAUSE.COM,

Defendants.

Case No. C-09-1972 BZ







**STIPULATED CONSENT PERMANENT
 INJUNCTION**

WHEREAS, this action having been commenced by the Plaintiffs, Chanel, Inc. (“Chanel”) and Louis Vuitton Malletier, S.A. (“Louis Vuitton”) (collectively the “Plaintiffs”) against the

Defendant Tony Bosini d/b/a Replicamaster.com, Shopreplica.com, Buyhighreplica.com, Ereplcabags.com, Exactwatches.net, Replicahours.com, Swissreplica.US, Thewatchespriceindex.info, Yourreplicawatch.com and Replicahause.com (the “Defendant”), alleging *inter alia*, trademark counterfeiting and trademark infringement, and false designation of origin and a copy of the Summons, Complaint and First Amended Complaint having been served upon the Defendant:














IT IS STIPULATED, ORDERED, ADJUDGED AND DECREED that:

1. This Court has jurisdiction of the subject matter of all counts of this action and over the named parties hereto.
2. Chanel is the owner of the following trademarks (the “Chanel Marks”) in connection with high quality handbags, wallets, watches, bracelets, earrings, and necklaces:

<u>Mark</u>	<u>Reg. No.</u>	<u>Reg. Date</u>
CHANEL	0,626,035	May 1, 1956
	1,314,511	January 15, 1985
CHANEL	1,347,677	July 9, 1985
	1,734,822	November 24, 1992
CHANEL	1,733,051	November 17, 1992
	3,022,708	December 6, 2005
	3,025,934	December 13, 2005
	3,025,936	December 13, 2005
CHANEL	0,955,074	March 13, 1973
CHANEL	1,571,787	December 19, 1989
J12	2,559,772	April 9, 2002
CHANEL	3,133,139	August 22, 2006
	1,501,898	August 30, 1988
CHANEL	0,612,169	September 13, 1955

1 CHANEL 0,902,190 November 10, 1970

2 8. Louis Vuitton is the owner of the following trademarks (the "LV Marks") in
3 connection with high quality handbags, wallets, watches, earrings, and necklaces:

4	<u>Mark</u>	<u>Registration No.</u>	<u>Registration Date</u>
5		0,286,345	August 25, 1931
6		0,297,594	September 20, 1932
7	LOUIS VUITTON	1,045,932	August 10, 1976
8		1,519,828	January 10, 1989
9		1,653,662	August 13, 1991
10		1,655,564	September 3, 1991
11	LOUIS VUITTON	1,990,760	August 6, 1996
12		2,098,630	September 23, 1997
13		2,177,828	August 4, 1998
14		2,181,753	August 18, 1998
15		2,263,903	July 27, 1999
16	VUITTON	2,657,903	December 10, 2002
17		2,773,107	October 14, 2003
18		2,828,919	April 6, 2004
19		3,107,072	June 20, 2006
20		2,378,388	August 22, 2000
	LOUIS VUITTON PARIS		

21 9. The Defendant and his respective officers, agents, servants, successors in interest
22 employees and attorneys, and all persons in active concert and participation with them are hereby
23 permanently restrained and enjoined, pending termination of this action from:

24 A. manufacturing or causing to be manufactured, importing, advertising, or
25 promoting, distributing, selling or offering to sell counterfeit and infringing
26 goods bearing the Chanel Marks and/or the LV Marks and/or any other
27 intellectual property owned by either Plaintiff and/or using the Chanel Marks
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- 1 and/or LV Marks and/or names in any manner;
- 2 B. using the Chanel Marks and/or LV Marks and/or the Chanel and Louis
- 3 Vuitton names in connection with the sale of any goods;
- 4 C. using any logo, and/or layout which may be calculated to falsely advertise the
- 5 services or products of the Defendant as being sponsored by, authorized by,
- 6 endorsed by, or in any way associated with the either of the Plaintiffs;
- 7 D. falsely representing himself as being connected with the Plaintiffs, through
- 8 sponsorship or association,
- 9 E. engaging in any act which is likely to falsely cause members of the trade
- 10 and/or of the purchasing public to believe any goods or services of the
- 11 Defendant, is in any way endorsed by, approved by, and/or associated with
- 12 either of the Plaintiffs;
- 13 F. using any reproduction, counterfeit, copy, or colorable imitation of the
- 14 Chanel Marks and/or LV Marks and/or any trademark owned by either
- 15 Plaintiff in connection with the publicity, promotion, sale, or advertising of
- 16 any goods sold by the Defendant, including, without limitation, handbags,
- 17 wallets, watches, bracelets, earrings, and necklaces;
- 18 G. affixing, applying, annexing or using in connection with the sale of any goods,
- 19 a false description or representation, including words or other symbols tending
- 20 to falsely describe or represent the Defendant's goods as being those of the
- 21 Plaintiffs, or in any way endorsed by the Plaintiffs;
- 22 H. offering such goods in commerce; and from otherwise unfairly competing
- 23 with the Plaintiffs.
- 24 I. secreting, destroying, altering, removing, or otherwise dealing with the
- 25 unauthorized products or any books or records which contain any information
- 26 relating to the importing, manufacturing, producing, distributing, circulating,
- 27 selling, marketing, offering for sale, advertising, promoting, renting or
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1 displaying of all products which infringe the Chanel Marks and/or the LV
2 Marks and/or any trademark owned by either Plaintiff; and
3 J. effecting assignments or transfers, forming new entities or associations or
4 utilizing any other device for the purpose of circumventing or otherwise
5 avoiding the prohibitions set forth in subparagraphs (A) through (I).

6 SO STIPULATED:

7 **Plaintiffs:** Chanel, Inc. and Louis Vuitton Malletier, S.A.

8 By their Attorney:

STEPHEN M. GAFFIGAN,
A PROFESSIONAL ASSOCIATION

9 By: /s

10 Stephen M. Gaffigan

11 Attorneys for Plaintiffs
Chanel, Inc. and Louis Vuitton Malletier, S.A.

12 **Defendants:** Tony Bosini d/b/a Replicamaster.com, Shopreplica.com, Buyhighreplica.com,
13 Ereplcabags.com, Exactwatches.net, Replicahours.com, Swissreplica.US,
14 Thewatchespriceindex.info, Yourreplicawatch.com, and ReplicaHause.com

15 By his Attorney:

LAW OFFICE OF AYAL ABRAMS

16
17 By: /s

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21 Attorneys for Defendant
Tony Bosini

22 SO ORDERED this 22 day of March, 2010.

23 
24 UNITED STATES MAGISTRATE JUDGE

25 Copies furnished to:

26 All parties of record
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